

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

DAVID M. GRECO,

Plaintiff,

v.

DET. LAUREN LAIELLI,
SERGEANT FRANK PACE, and
NEW JERSEY OFFICE OF
HOMELAND SECURITY AND
PREPAREDNESS,

Defendants.

Civil Action No.
22-cv-04058-RMB-EAP

**DEFENDANT SERGEANT FRANK PACE'S
NOTICE OF MOTION
TO DISMISS PLAINTIFF'S COMPLAINT**

ARCHER & GREINER, P.C.
1025 Laurel Oak Road
Voorhees, New Jersey 08043
(856) 795-2121

*Attorneys for Defendant,
Sergeant Frank Pace*

BY: VINCENT P. SARUBBI, ESQ.
DANIEL J. DEFIGLIO, ESQ.

TO: CLERK OF COURT AND ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on September 6, 2022, or as soon thereafter as counsel may be heard, counsel for Defendant Sergeant Frank Pace (“Defendant Pace”) shall move before the United States District Court for the District of New Jersey located at Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets Room 1050, Camden, NJ 08101, for an Order granting the Motion to Dismiss Plaintiff’s Complaint against Defendant, Sergeant Frank Pace, in its entirety with prejudice, pursuant to Fed. R. Civ. P. 12(b)(6).

In support of this motion, Defendant shall rely upon the enclosed Brief. A proposed form of order and Certificate of Service are also enclosed. Oral Argument is requested if opposition is filed.

ARCHER & GREINER, P.C.
Attorneys for Defendant,
Sergeant Frank Pace

By: *Daniel J. DeFiglio*
Vincent P. Sarubbi, Esq.
Daniel J. DeFiglio, Esq.

Dated: July 29, 2022

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing motion was contemporaneously served on July 29, 2022 to all counsel of record via ECF, and to Plaintiff, as follows:

David Greco, Pro Se
246 Orchard Avenue
Somerdale, NJ 08083
via Regular and Certified Mail

Additionally, a courtesy copy has been mailed to the Court, addressed as follows:

Honorable Renee Marie Bumb, U.S.D.J.
U.S. District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets Room 1050
Camden, NJ 08101
via Regular Mail

/s/ Daniel J. DeFiglio
DANIEL J. DeFIGLIO

Dated: July 29, 2022